

Ashley Richardson
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1 Taylor and I were very close friends. We had a
2 constant communication before things got very
3 strained and awkward between us. And so whatever
4 she was going to have with this new team was not
5 going to be the same. And I knew this team,
6 obviously, was hostile towards the Persistence team.
7 I could tell.

8 Q. Okay. And you -- when you say "I'm trying
9 to get as much done as I can before I have to pass
10 the baton" -- "passing the baton," you are referring
11 to Taylor's assets. And "as much done as I can,"
12 you mean as much training as possible?

13 A. I don't know. I don't actually think
14 that's what it was referring to. I think it was
15 referring to the allocation of Persistence and the
16 liquidity pools and swaps.

17 Q. So you wanted to put as much of Taylor's
18 assets as possible in those products before you had
19 to give them back?

20 A. No, that wasn't it at all. I was -- I was
21 saying, "What is the best yield and opportunity
22 here?" And it was that simple. I wasn't -- I
23 wasn't getting -- you -- I feel like the question
24 you are asking makes an assumption. I believed at
25 this point in Persistence, and I believed, you know,

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1 in -- in where it was headed. And this was going to
2 be the end of my determination of what was going to
3 happen with the Persistence assets. It was going to
4 be --

5 Q. At this point -- at this point, you have
6 been asked to return the assets. Isn't that right?

7 A. I mean, my understanding was to bring
8 the -- the hard wallets to Taylor.

9 Q. You didn't think that meant return the
10 assets to her and stop making trades?

11 A. That was never explicitly explained.

12 Q. So when Leih Wang says, "I'm taking over
13 the administration of Taylor's crypto assets," you
14 thought you still had free rein to trade her assets?

15 A. I don't think that I thought I still had
16 free rein. Obviously, I wasn't -- you know, these
17 were large amounts, and they were being allocated in
18 a specific way. But I -- you asked me a question
19 which was "What were you referring to in this
20 section of text messages?" And I'm answering your
21 question. What I was referring to in that section
22 of text messages was her allocation of Persistence
23 and ATOM on those pools.

24 Q. And -- but you recognize, don't you, this
25 is after you were asked to give the assets back?

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1 A. I had a conversation with Taylor, as I just
2 expressed in a previous question, mid-April. So it
3 would have been at this time. And Taylor directly
4 knew exactly about this allocation, authorized it in
5 the last exchange I had with her. In fact, I
6 brought the hard wallets to her address in Malibu.
7 I said, "Do you want to do this? This is an
8 opportunity." And she said, "Yes, I want to do it."
9 So I kept two of the wallets. I went home. I made
10 the transaction. I did the setups. And then
11 Michele later took those remaining two wallets to
12 Esztella at the Santa Monica house.

13 Q. So your -- your testimony is that despite
14 being told on March 25 that another professional is
15 taking over the administration of her assets,
16 despite being emailed and contacted multiple times
17 to receive the wallets -- and it's like handing the
18 wallets -- you still have the authority to execute
19 these trades for Ms. Thomson? That's your
20 testimony?

23 Q. You can object all you like. You were
24 asked three times, four times already, return the
25 assets, and you were still making investments.

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1 All I'm asking you if it's your testimony
2 that these were authorized or if these were after
3 you were asked to return the assets.

4 A. You are making -- you are assuming facts
5 that are not in evidence. You are taking a portion
6 of an email out of context for what was generally
7 happening overall and using that as a reason why
8 this shouldn't have happened. Taylor --

9 Q. Can you scroll down, please. There's
10 another chat, 2144. You write: "Trying to help you
11 have the best shot." "You" being Mr. Aggarwal. "I
12 also think it's good for T." I assume that's
13 Ms. Thomson. Do I have that right? In this
14 context, "you" is Aggarwal, T is Ms. Thomson?

15 A. Yes.

16 Q. Okay. "This was set aside and I know the
17 one percent is there. Best to take advantage."

18 A. No.

19 Q. What's the one percent?

20 A. Okay.

21 Q. Is the one percent the finder's fee that
22 you agreed --

23 (Simultaneous colloquy.)

24 A. In -- in relation to this, I do not know
25 what it referenced, but can I can tell you without a

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1 shadow of a doubt there was no compensation. I
2 remember -- I remember -- this is what I remember
3 about this trade.

4 At that moment in time, I felt very badly
5 for Persistence because they were, you know, trying
6 to build this, and I was concerned genuinely that
7 Taylor was taking her assets to Safferys and they
8 were going to just liquidate them. And I didn't
9 know what that was going to do to Persistence. And
10 so I said, look, you know, what do you guys have?

11 We were trying -- when we started to invest
12 in Persistence, there's so many things that are not
13 included in this. There was a genuine energy from
14 Taylor and from me that we wanted them to do well.
15 And they seemed like lovely people. I had nothing
16 to think otherwise. I don't believe they ever did
17 anything untoward. And if they did, I'm not aware
18 of it. I'm not saying that they didn't. There may
19 have been --

20 Q. I'm asking a narrower question. You said,
21 "I know the one percent is there, so best to take
22 advantage." Isn't the one percent the finder's fee?

23 A. No. I do not know in this -- in this
24 context. I would have to go back and read it,
25 truly. I -- I am not saying this to stall time.

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1 I'm not saying this to do anything other than to say
2 I cannot answer that accurately in a snapshot. I
3 really can't.

4 Q. And when you say "best to take advantage,"
5 happy face, that's because you still had control of
6 Ms. Thomson's assets at this time; isn't that right?

7 A. With all due respect, Mr. Evans, I think I
8 just told you I cannot answer that question
9 accurately. And so you trying to make me answer it
10 in a certain way is not going to happen.

11 Q. These -- I didn't write this. These are
12 your words.

13 A. Yes. You didn't -- you -- you put context
14 to something that doesn't exist. And I'm not --
15 like, I'm saying I need to review the document. I
16 don't know that that's what it means. This was a
17 text message exchange that happened four years ago.

18 Q. If you scroll down it says --

19 (Simultaneous colloquy.)

20 A. I need to -- I need to say this clearly.

21 Q. There's not a question pending. We ask
22 questions. You answer them. This is how it works.

23 A. Mr. Evans, you are asking questions to
24 mischaracterize what actually happened. And I don't
25 think -- I don't think that that referred to the

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1 finder's fee is what I'm saying. What I would like
2 to do is review the document in full and have that
3 chance so that I can answer it accurately. Because
4 if I was to say that refers to the finder's fee,
5 that would be two things. One, I have no idea. And
6 I actually think, truly, there may have been one
7 percent applied to something in the staking pools.
8 That could have been one percent to Taylor.

9 I am not -- I am telling you very, very
10 honestly I need to review that document. Because
11 you saying isn't it a certain way, I'm saying
12 absolutely not. There were so many things happening
13 at that time. There were so many movements of -- of
14 product and materials. That could have been any
15 number of things.

16 Q. No. I'm saying that when you -- when you
17 are sending a message to the person who previously
18 paid you a quote/unquote finder's fee for getting
19 Ms. Thomson involved in the investment, after you
20 had been asked to return the asset, you continue to
21 make investments, and you say, "I know the one
22 percent is there. Best to take advantage," happy
23 face, I'm asking you whether that's referring to a
24 finder's fee. It's the same percentage you were
25 paid before.

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1 A. That's absolutely not a fair thing to
2 assume.

3 Q. Okay. So when you say "I just put on 6
4 million of ATOM," whose ATOM was that?

5 A. I can only assume that it was Taylor's
6 ATOM.

7 Q. Okay. When you say "I only have 2 million
8 ETH but will add," whose ETH was that?

9 A. Obviously Tushar is aware. Maybe I phrased
10 it wrong, but it's -- every -- it was always
11 Taylor's.

12 Q. Okay. And you said, "It's my gift while I
13 can still give it," happy face. What do you mean by
14 that?

15 A. Liquidity on the platform.

16 Q. It's your gift of Ms. Thomson's assets;
17 isn't that right?

18 A. No. No, that's not correct. You are --

19 Q. There's 6 million of ATOM. You just said
20 that was Ms. Thomson's. The 2 million of ETH, you
21 just said that's Ms. Thomson's. And then you said,
22 "It's my gift while I can still give it."

23 A. You are taking what the intended
24 conversation was completely out of context. If you
25 would like me to contextualize it for you, I'm happy

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1 to, but that is not correct.

2 Q. It's right there. You wrote it.

3 A. Right. And if you would like me to give it
4 context, I would be happy to. You can -- you have
5 done this in the past. You have taken things out of
6 context and you put them in legal documents that
7 were filed, including the original legal document,
8 that look a certain way, but when you actually
9 scroll back, you see that it's contextualized and
10 has nothing to do with it.

11 Q. You can take this down. This is Exhibit 6.

12 A. Wait. Let me finish. Let me finish. I
13 have a right --

14 Q. Ms. Richardson, there's not a question
15 pending.

16 (Simultaneous colloquy.)

17 (Reporter admonition.)

18 A. You just asked a question about something
19 that has context, and I have -- I think that I -- it
20 is within my rights to answer it so that it can be
21 on the record with proper context, and I would like
22 to take that opportunity.

23 This was a staking pool that was on the
24 Terra chain to the best of my memory. They needed
25 to add liquidity because, to the best of my

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1 understanding, the liquidity made the whole thing
2 work. Like, staking pools don't work without the
3 liquidity.

4 In order to -- to obviously make it great
5 for Taylor, they created a very high yield for her
6 staking on there. So Taylor knew that if her ATOM
7 was parked on this platform, it was going to be
8 creating an additional yield that was -- it was
9 substantial. It wasn't crazy, but it was very
10 substantial. And it was a pair. So it would have
11 been like -- it was like a pair of ATOM/ETH. That's
12 how the liquidity pool worked. It required a pair.

13 So the gift was the parking of the assets
14 on the platform. The upside was substantial for
15 Taylor because by parking it on the platform, she
16 was going to receive the yield. The -- the gift for
17 Persistence was they were going to receive the
18 liquidity. Both were winners. I got nothing out of
19 it, but I was genuinely wanting Taylor to win and I
20 wanted Persistence to win. They were both really --
21 you know, at the time I still thought Taylor was a
22 great person and, you know, I would love to believe
23 that. But, at that moment in time, that was the
24 reason for it.

25 And so you don't know that context. It's

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1 very confusing. There's -- there's a lot of subtext
2 that isn't included in that -- in that note, but
3 nothing was given to Tushar. What -- what was
4 happening was Taylor's assets were being parked on
5 that -- I can't remember the exact word, but it had
6 to do -- it was a liquid staking pool on a Terra
7 chain. And Taylor was going to receive yield.
8 Tushar was going to receive the liquidity in his
9 pool. Both were supposed to be winners. And then
10 the market crashed and everybody lost.

11 Q. So the 6 million of ATOM and the 2 million
12 of ETH, both those trades were losers, right?

13 A. Every cryptocurrency that existed was a
14 loser within weeks of that time. The entire market
15 went off of a cliff. Nobody was a winner who was in
16 crypto.

17 Q. You can take this down.

18 When did you stop trading Taylor's assets?

19 A. I don't know. I would say it was probably
20 late June of 2022. Somewhere around that time.
21 Summer of 2022. I can't say approximately.

22 Q. Okay. And during that time, what kind of
23 transactions were you entering into?

24 A. I mean, I can't -- I can't say
25 specifically. It was -- it was voluminous. It

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1 was -- you know, I know that I was attempting to --
2 attempting to hedge losses in a falling market that
3 I was woefully underequipped to do and --

4 Q. So there are a significant number of margin
5 trades; isn't that right?

6 A. That may have been correct.

7 Q. What about leverage trading? Was there any
8 leverage trading?

9 A. I am sure there was.

10 Q. Okay. What about spot trading? Any stock?

11 A. I can't say with certainty. You know, I --
12 I can't say with certainty on any specific. It was
13 a very stressful time, but there were -- there were
14 many trades that happened.

15 Q. And let me ask you this. In April, you
16 gave the hardware wallets back. Didn't your
17 communications with Ms. Thomson cease in April or
18 May, and June and July there was very limited
19 communications between you both? Isn't that right?

20 A. It was limited because I was dealing with
21 the death of my stepmother and a lot of fallout
22 around our family estate.

23 Q. Okay. So during that time, May, June,
24 July, were you discussing leverage trading with
25 Ms. Thomson?

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1 A. I wasn't discussing it specifically, no.

2 Q. Were you discussing perp trading with
3 Ms. Thomson?

4 A. I wasn't discussing it specifically with
5 her, no, but there were many trades that I did that
6 weren't discussed with her directly.

7 Q. Just give me one second.

8 A. I just --

9 (Simultaneous colloquy.)

10 Q. Do you trade cryptocurrency in your
11 personal capacity?

12 A. I first want to say, in relation to the
13 last section, it's -- I'm happy to go there, but I'm
14 objecting that it's not directly relevant to the
15 lawsuit in question. The lawsuit in question is
16 about Persistence. It's about defrauding Taylor.
17 And now we have gone into a different lane that I
18 understand you have every right to discuss, but I
19 just want to put that objection for -- for relevance
20 there.

21 Q. Your objection is noted.

22 Do you trade cryptocurrency in your
23 personal capacity?

24 A. I have, yes.

25 Q. Okay. When -- when you were talking to

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1 Ms. Thomson about trading in XPRT, did you yourself
2 trade in XPRT?

3 A. Yes.

4 Q. Okay. When did you trade in XPRT?

5 A. Unfortunately, I bought the majority of my
6 XPRT when it was -- it was -- I think it was in May,
7 when it was \$16.

8 (Reporter clarification.)

9 Q. Okay. Did you trade any XPRT prior to
10 Ms. Thomson's investment?

11 A. A small amount. And then the majority I
12 did when the price dropped, at the same time as her.

13 Q. Were there other forms of cryptocurrency
14 that you invested Ms. Thomson's money into? Did you
15 trade any of those assets yourself too?

16 A. I mean, we were both trading similar assets
17 because we were using the predictions of Whitedove
18 and Robert Sabella to sort of dictate what we were
19 going to invest in. So yeah, we were doing the same
20 things. We were basing it off of the predictions of
21 the psychics.

22 Q. In any instance, did you trade a particular
23 asset before Ms. Thomson's asset was traded?

24 A. I can't say with certainty. There were so
25 many trades that happened. It's possible, but I --

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1 I can't say across the board.

2 Q. Okay. Were you in any -- any Telegram
3 chats with other traders?

4 A. I -- I think I put those in my -- in my --
5 my production.

6 Q. Okay. Did you ever talk to anybody else
7 about investments that Ms. Thomson was going to make
8 into particular tokens or projects?

9 A. I probably did, but I don't remember
10 specifically.

11 Q. Okay. Do you know one way or the other
12 whether those people traded in advance of
13 Ms. Thomson's trade?

14 A. Absolutely not. Not to my knowledge.

15 Q. Where did you trade your personal assets?

16 A. I mean, all over the place. I, you know --
17 I use many, many exchanges, and I probably won't
18 cover them all because crypto is like very complex.
19 And at that time, before I realized that, you know,
20 overdiversifying is a bad thing, I think I was
21 trying everything I could find. I was looking at,
22 you know, like everything from SushiSwap to
23 PancakeSwap to, you know, obviously Coinbase. And
24 the Binance account I -- I opened when Taylor turned
25 me on to Bitcoin in 2017.

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1 Q. Give me one second.

2 The centralized exchange accounts, do you
3 have a Binance account?

4 A. I don't now. I had a Binance account.

5 Q. All right. What about Gate and PrimeXBT?
6 Do you have your own accounts there too?

7 A. I cannot remember with certainty. I
8 believe I had a Gate account, and I don't know if I
9 had a PrimeXBT account or not. I can't recall.

10 MR. EVANS: Okay. All right.

11 Todd, my questions are -- are complete. I
12 think you might have some more.

13 MR. HARRISON: Okay.

14 MR. EVANS: Thank you, Ms. Richardson.

15 THE WITNESS: Thank you.

16 MR. HARRISON: I have got more questions.
17 Do you want to take a five-minute break, or do you
18 want to keep going?

19 THE WITNESS: I think we keep going. What
20 do you want to do?

21 MR. HARRISON: I'm fine taking a
22 five-minute bathroom break.

23 THE WITNESS: Okay. I can do that.

24 THE VIDEOGRAPHER: We are off the record at
25 2:15.

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1 (Break taken.)

2 THE VIDEOGRAPHER: Back on the record at
3 2:22.

4 MR. HARRISON: Thank you.

5 Q. Ms. Richardson, I just have a few minor
6 questions. I just want to go back a little bit to
7 your job history and your education.

8 A. Okay.

9 Q. You don't have any education or training in
10 financial management, correct?

11 A. No.

12 Q. Okay. And no -- no education or training
13 in financial advising, right?

14 A. No. I'm not a financial adviser.

15 Q. Okay. And you -- you don't have any other
16 degrees or certifications that I don't know about,
17 right? That weren't on --

18 A. Not that I know of that I can think of.

19 Q. So no, like, cryptocurrency certifications?
20 There are some out there, cryptocurrencies
21 certifications.

22 A. Okay. Not that I'm aware of.

23 Q. Okay. And you have never been a licensed
24 security broker-dealer in California, right?

25 A. No.

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1 Q. Okay. I want to point you to

2 November 2021.

3 A. Okay.

4 Q. In November 2021, Ms. Thomson told you that
5 she was going to be moving to London, correct?

6 A. I think I knew she was going to be moving
7 to London for years. I mean, that was the plan.

8 Q. Okay. May -- you might have known for
9 years, but she -- she was going to actually move and
10 she told you she was going to actually move in
11 November of 2021, I believe, correct?

12 A. I don't think that there was a definitive
13 this moment. I think that I knew -- I was aware she
14 was going to move to London for quite some time. I
15 sat in on calls with her and accountants in August
16 of 2021 about the move. So, I mean, it wasn't news
17 to me.

18 Q. Okay. And why were you sitting in with
19 calls with her accountants about the move in August
20 of 2021?

21 A. Because she thought that they were ripping
22 her off.

23 Q. That what?

24 A. She thought that they were ripping her off.

25 Q. The accountants?

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1 A. Yeah. She didn't think they were doing a
2 good job, and so she wanted me to listen in. She
3 had me listen in to all kinds of things.

4 Q. Okay. In that August, September, October
5 time period, you raised with Ms. Thomson the idea
6 that you thought that you should get compensated for
7 handling her crypto for her, correct?

8 A. I -- I think I might want you to rephrase
9 the question because my first response would be I
10 never wanted to be a paid employee of Taylor's, and
11 that was always clear. So -- so I would say that is
12 one thing that I do know. I did not want to be paid
13 for the work I was doing, but I also did not ever
14 anticipate that I was going to take on that level of
15 -- of consistent, like, all-encompassing work for
16 her, and that I was losing other opportunities.

17 Q. Okay. And you started saying -- I'm going
18 to say "complaining." I don't necessarily mean it
19 negatively. But you started complaining that
20 managing Ms. Thomson's cryptocurrency was taking a
21 lot of your time, correct?

22 A. It was taking all of my time.

23 Q. Okay. But you were not her --
24 Ms. Thomson's employee, correct?

25 A. That is correct.

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1 Q. Okay. And so you didn't have to manage her
2 cryptocurrency, correct?

3 A. I didn't have to do any of the things I did
4 for Taylor over the years.

5 Q. Okay. And you weren't getting paid to
6 manage her cryptocurrency, correct?

7 A. I wasn't getting paid to manage her
8 cryptocurrency. I wasn't a fiduciary. I was
9 helping her do something. At first I tried to help
10 her do it herself, and then she asked me to do it.

11 Q. Okay. And then you had a discussion -- you
12 and Ms. Thomson had a discussion in November of 2021
13 where Ms. Thomson talked to you about moving to
14 London, and she told you that she would take custody
15 of the cryptocurrency back and put it with an
16 official cryptocurrency custodian, correct?

17 A. I think that misconstrualizes the
18 understanding between us, because it was always the
19 goal to find a custodian that would be able to
20 safely protect the cryptocurrency and keep it
21 staked, and we were working to that end. So there
22 was never -- there was no surprise with that.
23 Having cryptocurrency in my house was not something
24 I wanted. It was not safe for me. It was not good
25 for anybody. We were trying -- nothing existed at

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1 that time. So the goal was find something that
2 exists or create it. And we have talked about that
3 a lot. Like, what could be built to safeguard her
4 assets. And I was very excited that there could be
5 something, but I was concerned that she would lose
6 the ability to keep her assets staked.

7 Q. Okay. So -- but she told you in November
8 of 2021 that she was going to take custody of her
9 cryptocurrency back and put it with a professional
10 cryptocurrency custodian, correct?

11 A. I don't remember an exact date. That was
12 always the understanding of what was going to
13 happen.

14 Q. Okay. Then why did it -- why did you not
15 return her cryptocurrency for another eight or nine
16 months?

17 A. There was nowhere for it to go. That was
18 the only reason.

19 Q. Well, there are -- there's multiple
20 correspondence, written communications, between you
21 and Ms. Thomson over the next six or seven or eight
22 months where Ms. Thomson is asking you repeatedly to
23 talk to her accountants and give them an accounting
24 of the cryptocurrency and to return the
25 cryptocurrency, correct?

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1 A. So I'm going to object on the compound
2 nature of that question. And if you would like me
3 to answer it in parts, I would be happy to.

4 Q. Go ahead.

5 A. But the way you structured it, it's just
6 too much for me to remember and answer adequately.
7 And I would love to answer each of those things
8 independently.

9 Q. Go ahead.

10 A. Can you ask me specifics? Because you
11 asked me about five questions in that question.

12 Q. In the six or -- in the six to eight months
13 following November of 2021, Ms. Thomson repeatedly
14 asked you to get on the phone with her accountants
15 and give them an accounting of the crypto, correct?

16 A. I want to say that I would disagree with
17 that. I -- I want to preface this by saying I was
18 not a fiduciary. I was not under any kind of term
19 or agreement with Taylor. I had no understanding
20 that I was supposed to be keeping an accounting of
21 the cryptocurrency. I was helping her to execute
22 the trades. And there was never a set of
23 understanding.

24 After the fact, and to the best of my
25 memory it was around the time we are talking about,

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1 spring, there was a request for accounting that I
2 did not possess. Because there were thousands of
3 purchases that had happened up to that point, and
4 then after the fact of the purchases being made, I
5 was asked for an accounting.

6 So that accounting did not exist because it
7 was never specified. It was never requested. I was
8 not a fiduciary. I was just somebody helping her
9 purchase crypto. And yes, she made requests, but
10 she was requesting something I did not have.

11 Q. Right. But she was requesting an
12 accounting from you for many, many months, correct?

13 A. I disagree with that. I believe the first
14 request I received was in -- I can't say with
15 certainty, but it would have been -- I remember it
16 specifically fell around the time that my stepmother
17 passed away, because I was suddenly inundated with
18 dealing with a lot of major issues, and I got sick.
19 And I remember getting accounting requests and
20 thinking I don't have this and also I don't have
21 time right now, like, to deal with this. So that is
22 the memory that I have of that specifically, but it
23 was -- it's kind of --

24 Q. But you never told her that, right? Over
25 the next six months you -- you skipped meetings and

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1 you avoided telling Ms. Thomson that you didn't have
2 the accounting information that she was looking for,
3 correct?

4 A. I think I -- I did tell her on some level,
5 but you have to understand, this is -- there was no
6 reason for me to have accounting information. I
7 wasn't doing anything untoward or preventing
8 anything. I think -- you are -- I believe that you
9 are trying to take this in a direction that says I
10 didn't do something and I was avoiding a fiduciary
11 responsibility. What I'm saying is I didn't want my
12 friend to be disappointed in me because I didn't do
13 this the whole way, because I didn't even know to.

14 Q. So -- but I think we are agreeing. You --
15 I didn't ask you anything about fiduciary
16 responsibilities. All I said was for several --
17 about six to eight months you did not give
18 Ms. Thomson an accounting --

19 A. No, no.

20 Q. -- when she asked for it, correct?

21 A. Absolutely incorrect. Six to eight months
22 is absolutely incorrect.

23 Q. How long -- from the first time that you
24 remember Ms. Thomson asking you for an accounting of
25 her cryptocurrency, how long was it until you

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1 finally told her that you didn't have the
2 information she was looking for?

3 A. To the best of my memory, that started
4 after my stepmother passed and after this time
5 period. So it would have been -- late April of 2022
6 is a guesstimate. And then there were lawyers at my
7 house in June of 2022. So what is that? Two or
8 three months?

9 Q. Okay. And so it's your testimony that you
10 don't recall Ms. Thomson ever asking for
11 accounting-related information for the
12 cryptocurrency between November of 2021 and April of
13 2022?

14 A. Whatever she asked for I gave her an
15 extensive accounting in November to the best of my
16 ability and understanding at the time. What was
17 asked of me later --

18 Q. But you've testified repeatedly that you
19 didn't have the information she was looking for.

20 A. I didn't. Because what I had was here are
21 the assets where they were that moment. I didn't
22 have an accounting for how they were purchased. You
23 have to understand -- okay -- in order to purchase
24 microcaps at these dollar amounts, Taylor would text
25 me in the middle of the night and say I want 10

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1 million this. I want 10 million this. To execute
2 those purchases, when you make large purchases, the
3 price jumps up. So there had to be thousands of
4 purchases in order to get to that 10 million. It
5 had to happen over days sometimes. And if it wasn't
6 finished, she would get very upset. Like is it
7 done? Do you have it? Is it staked?

8 So I would make those purchases over time.
9 A lot of times I was making purchases with Ethereum
10 or ATOM, and they were like a token for a token.

11 Q. I'm just -- you are not responding to my
12 question at all.

13 A. No, I am.

14 Q. So I'm just trying to figure out is your
15 point you did not keep the records that they were
16 looking for?

17 A. Let me finish what I'm saying.

18 Q. But you're not answering my question.

19 A. I am.

20 Q. It was a totally different question.

21 A. If you actually let me finish what I'm
22 saying, I'm getting --

23 Q. Well, if you actually answer my question,
24 I'd be happy to listen.

25 A. I -- I don't appreciate you -- you cutting

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1 me off in the middle before I've gotten a chance to
2 make the point.

3 Q. I don't appreciate you not answering my
4 question.

5 A. If you let me finish, I would be answering
6 your question is what I'm saying.

7 Q. Let's see.

8 A. Okay. You can tell me how I do afterwards.
9 All right. I'm trying really hard.

10 Q. I'm not going to do that. I'm not
11 interested in doing that. I just want you to answer
12 the question.

13 A. I -- I cannot answer the question in a way
14 that is fair --

15 Q. It's a pretty simple question. Let me
16 rephrase it so we are all clear.

17 You didn't give Ms. Thomson and her
18 accountants the accounting information they're
19 looking for because you hadn't been keeping those
20 types of records, correct?

21 A. And now I'm going to finish what I was
22 saying previously in order to answer the question,
23 which is, for every single purchase, which was --
24 had to be incrementally done, it never occurred to
25 me -- I was not asked to keep records of anything.

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1 Nobody ever said we need records. I was making
2 thousands upon thousands of trades to get her to the
3 point. That was my job as far as I understood it.
4 I didn't know that it was also my job to be an
5 accountant.

6 Q. But all those trades had gains and losses,
7 right?

8 A. I have no idea.

9 Q. You are trading something on the value
10 system for other coins or for U.S. dollars. There's
11 gains and losses to each trade. Otherwise why would
12 you make them?

13 A. She wanted a purchase executed. I was
14 executing the purchase. You are stating that I -- I
15 have some unwritten expectation to also be an
16 accountant at the same time. I'm telling you I did
17 what was asked of me.

18 Q. But forget about the accountant part for a
19 minute.

20 It's your testimony that you didn't think
21 that Ms. Thomson would expect you to keep records of
22 the trades?

23 A. None of it ever occurred to me. I was
24 doing -- I was doing -- it never occurred to me that
25 I would be executing hundreds of millions of dollars

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1 of purchases in my house, first and foremost, and it
2 never occurred to me that she would continue with
3 such fervor and FOMO. And -- and I was working so
4 hard, trying to understand how to do it. It was
5 insanely complicated. I mean, do you know how scary
6 it is to move millions of dollars on a block chain
7 and not lose it? It is very stressful. So I
8 wasn't -- no, it didn't occur to me. I'm being
9 very, very transparent. I was so overwhelmed by the
10 pressure of the execution that I wasn't thinking
11 about it.

12 Now, in hindsight, I also was like oh, my
13 God. And I was afraid that I let her down,
14 genuinely. I wasn't worried about --

15 Q. That's why -- maybe understandably from
16 your point of view, but you were avoiding answering
17 her question about the fact that you didn't have the
18 records and the accounting of the trades, right, for
19 many months?

20 A. I don't think that was the sole reason. I
21 think it wasn't --

22 Q. What were the other reasons?

23 A. You are mischaracterizing the time period.
24 It was a short window of time. And during that
25 specific window of time my entire life was imploding

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1 with personal issues. That was the main reason.

2 Q. Okay. What were the other personal issues?

3 A. I was extremely ill. And I inherited a
4 house that was -- disaster zone. The mortgage
5 hadn't been paid for months. My stepmother's family
6 had been, you know, keeping things from us. So I
7 had to go in and kind of run triage on it. And
8 that -- and then I got very, very sick. Those were
9 the main issues.

10 This -- this was a small window. It wasn't
11 -- we are talking about the month of May, really,
12 and -- and not many months. Because I saw Taylor in
13 April. Things were above board. I went to -- you
14 know, I came up north. And then while I was still
15 up north, within less than a month and a half, you
16 guys sent somebody to the house with allegations.

17 Q. So -- I'm sorry. Just to list the things
18 that you were going through. One was you inherited
19 a house that was a disaster, right?

20 A. Well, I didn't -- I wasn't -- yes, that was
21 one of the things.

22 Q. Okay. And I think -- I'm sorry. I didn't
23 hear the whole thing. Your stepmother died, I
24 think, at some point, right?

25 A. Okay. The answer to this question is --

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1 you said you avoided her for many months. My answer
2 is this. A, it was a short window of time from
3 start to finish. It was not many months.

4 Q. What do you think was the period of time in
5 which you did not answer Ms. Thomson's questions
6 about getting the records and an accounting of --

7 A. To the best of my memory, it was the month
8 of May.

9 Q. Okay. Okay. So -- I'm sorry. You
10 inherited a house. And when did your stepmother
11 die? In April you said?

12 A. The end of March. But I didn't find out
13 about it because nobody informed us.

14 Q. I'm sorry to hear that.

15 And you said you got ill during this period
16 too. When -- when did you get ill?

17 A. I got really ill in May.

18 Q. What did you get ill with?

19 A. I -- there was extreme mold in the house
20 and so I got really sick with mold toxicity. It's
21 documented.

22 Q. How is it documented?

23 A. It's documented in -- emails and text
24 messages and a doctor's visit.

25 Q. Okay. Do you have any medical records

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1 relating to that?

2 A. I think that's privileged, but you know, I
3 have -- I don't see how it's relevant to the case.

4 Q. Well, you made it -- I didn't ask you about
5 it. You brought it up as a reason as to why there
6 was a delay in answering Ms. Thomson's questions
7 about accounting. You brought it up. Not me.

8 A. I think that within context of the realtime
9 period we are talking about and the things that were
10 going on in my life, those were very real. I'm not
11 saying -- I'm not refuting what you are saying,
12 which was I was avoiding it on some level, because I
13 didn't have it.

14 Q. Okay. Do you remember during this period
15 telling Ms. Thomson or her daughter that you had --
16 you couldn't make a meeting with them because you
17 had gone into anaphylactic shock?

18 A. Well, I was -- I was having anaphylaxis
19 because of the mold.

20 Q. Okay. How long did you have those problems
21 related to the mold?

22 A. I mean, it was acute for, I want to say,
23 weeks. And -- and then it was bad for months. It
24 wasn't -- it wasn't like I was -- you know, it
25 wasn't debilitating for months, but it was really

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1 bad for a few weeks.

2 Q. Did you ever go to the hospital for it?

3 A. I did get medical care for it at one point.

4 Q. What does that mean, "medical care"?

5 A. Like, I went in because I was worried about
6 -- I can't remember exactly what the -- what the
7 circumstances was, but I was really sick.

8 Q. Did you ever go to a hospital?

9 A. I don't think it was a hospital. I think
10 it was an urgent care, but I can't remember off the
11 top of my head. I have been to the hospital many
12 times. I don't know if I went in that window or
13 not.

14 Q. Okay. Did you have any other illnesses
15 during this period? And "during this period," I'm
16 talking about from November of 2021 to June 2022.

17 A. Are we changing topics now?

18 Q. No.

19 A. Well, you were talking about the accounting
20 and that specific time period, and now you just --

21 Q. All I'm asking you about is illnesses now.

22 A. Okay.

23 Q. So did you have any other illnesses between
24 November of 2021 and June of 2022?

25 A. I had a number of health issues that I

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1 think were compounded by stress.

2 Q. Okay. What were those?

3 A. Do you want me to discuss both physical and
4 mental or --

5 Q. Sure.

6 A. Okay. I think starting in -- I have to --
7 I have to -- I have to give a broad date range
8 because I can't remember specifics, but I can say in
9 the fall of 2021 I started having very strange heart
10 symptoms and dizziness and vision issues, and I
11 wasn't sleeping normally. I started having insomnia
12 because I was very afraid about having crypto in the
13 house. I -- I didn't want to leave the house. I
14 went away with Madeleine for a week, and I was not
15 comfortable with -- that was the only time I left
16 the house. And before I did it, I sent like as much
17 crypto as I could to Anchorage because I did not
18 want it in my house.

19 Q. While you were gone you mean?

20 A. No. I wanted it out of -- I did not want
21 to have it. So I was like -- Taylor wanted me to
22 keep the Bitcoin to transact it with other alt
23 coins.

24 And when I was going to Mexico, I said I'm
25 not comfortable having this asset when it could be

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1 parked at Anchorage, because Anchorage had the
2 capacity to hold digital assets and insure them, and
3 I didn't have that. In my house, it was -- you
4 know, it was cryptocurrency that, if anybody found
5 out that was at my house, could have caused me
6 tremendous harm. And for that reason, I -- I was
7 not able to sleep. And that kind of compounded some
8 underlying health issues, but it certainly -- I
9 think the stress of, also, the transactions.

10 Every time, especially with Persistence, if
11 you get one thing wrong, the money is gone. It's
12 not like moving money in the United States from a
13 bank to a bank where it's tracked, and like, you
14 know where it's going. If you -- if you miss
15 something, the money is gone. It evaporates. And
16 this was before the -- this was when the market was
17 going up. It was the bull run. So there wasn't --
18 we weren't having any losses due to market crashes,
19 but there was losses because -- sorry. There
20 weren't losses on my side.

21 But around that time, Karan, who was
22 Taylor's -- Taylor's head of -- I think he was her
23 IT guy, but like a -- I don't know -- a bigger one,
24 because she has a lot of IT. Taylor entrusted some
25 wallets to him with NFTs. He did something wrong.

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1 I can't remember. He lost a key or if he lost a
2 password. And then there was like \$10 million just
3 gone. And I -- he called me and he was so
4 terrified. You know, it was like -- I mean, I felt
5 so badly for the guy because it wasn't -- obviously
6 there was no ill intent, but it was a really intense
7 cautionary tale of how easy it was for things to
8 just disappear.

9 Q. But Karan was Ms. Thomson's employee,
10 right?

11 A. Yeah.

12 Q. You weren't her employee, were you?

13 A. No.

14 Q. And you weren't getting paid to hold the
15 crypto, were you?

16 A. No.

17 Q. So you could have given it back to
18 Ms. Thomson at any time, correct?

19 A. I tried. There wasn't --

20 Q. When did you try to give her the
21 cryptocurrency back?

22 A. Okay. This implies that she wasn't
23 actively wanting me to do something with it. And --
24 and there's two different stories to this. I think
25 that if you want to go down that path I can give you

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1 context for it. But I felt responsible to help
2 Taylor do this. Taylor wanted -- I knew Taylor
3 wanted --

4 Q. Why? You weren't her employee. She wasn't
5 paying you.

6 A. That's what I'm going to tell you.

7 Q. And you have free will, right?

8 A. She was my friend.

9 Q. Okay.

10 A. She was -- I know that you are seeing this
11 in a limited context, and you are a lawyer.

12 Q. I'm really not. I think anyone listening
13 to your story would say, if it was making you ill,
14 like you say, and it was causing you so much stress,
15 like you say, and you were not an employee and you
16 weren't getting paid and you had no fiduciary duty
17 and you had no obligation to do -- manage the
18 cryptocurrency, then logically a person in your
19 position would have given it back.

20 A. No. Because my history with Taylor, I
21 really felt genuinely like -- first of all, when
22 this trading started, I had no plan, interest, or
23 understanding that I would be doing any of the
24 trading or that I would be holding the custody.

25 I sat with Taylor and I tried to explain to

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1 her how to set up a ledger wallet. That was like an
2 afternoon. I got the wallets. I was like okay. We
3 are going to set these wallets up. I --

4 Q. Go ahead.

5 A. I don't want to see the keys. I really
6 wanted nothing to do with it. So we went through
7 the exercise. I showed her how to set up the ledger
8 wallet. She --

9 Q. I'm sorry, Ms. Richardson. This is not at
10 all responsive to my question.

11 My point was you had free will and you
12 could have given the crypto back, right?

13 A. Well, I'm -- I'm telling you -- I'm giving
14 you context for the why.

15 Q. But the context has nothing to do with --
16 that you are giving has nothing to do with my
17 question.

18 A. It does.

19 Q. Did you have free will and the ability to
20 give the cryptocurrency back at any time or not?
21 That's the question.

22 A. There was nowhere for it to go. There was
23 nobody who could execute those trades. There was no
24 third party that was -- at that point. All of the
25 trades that could go through Anchorage did.

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1 Q. You don't think Ms. Thomson could have
2 hired someone else?

3 A. There was nobody. She didn't want -- you
4 have to understand --

5 (Simultaneous colloquy.)

6 Q. Let's be clear. There were plenty of
7 people that were much more qualified than you to
8 manage the cryptocurrency, right?

9 A. Not at that moment.

10 (Simultaneous colloquy.)

11 Q. There were professional custodians as well,
12 correct?

13 A. There were no professional custodians at
14 that -- let me finish my question, please.

15 There were no professional custodians at
16 this time -- because we did extreme research -- that
17 could do those low-caps. Anchorage did a lot of
18 mid-caps, and what we worked with Anchorage on
19 directly. I had no dog in that fight. I was
20 calling Anchorage and saying hey, can you guys hold
21 Persistence? Can you hold these things? The goal
22 was to get them into a custodial environment where
23 they were insured and protected always.

24 And up until that point, she was doing
25 rapid-fire purchases. So those purchases were

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1 happening through me. They weren't -- anything that
2 could be purchased through Anchorage was being
3 purchased through Anchorage. Anything that was
4 being purchased and held at Anchorage was.

5 The only things I were purchasing were
6 extreme low-caps that were not available in a
7 custodial environment. So things like -- I can't
8 even remember what it was called. There was one
9 UK-based crypto and it had its own mechanism. I
10 mean, these were things that were so off the wall,
11 like OHM, and all these things that did not have --
12 I looked. I asked Tushar. I mean, if you really
13 want to go through --

14 Q. The only question on the table is you -- is
15 it really your testimony that you don't think
16 Ms. Thomson could have hired someone more qualified
17 and more competent than you at any moment to handle
18 her cryptocurrency?

19 A. Yes.

20 Q. Really?

21 A. At that moment in time it didn't exist. We
22 were trying to find somebody. That is my testimony.

23 Q. Okay. I am going to hand you -- or Josh is
24 going to hand you --

25 Do you have another copy of this?

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2 You testified previously that you don't
3 think you got any requests for an accounting on the
4 cryptocurrency until approximately April or May of
5 2022, correct?

6 A. I mean -- okay. Let me rephrase that.

7 There was a snapshot of what assets were, but there
8 weren't like a specific purchase price. They were
9 two different requests. There was a request for a
10 snapshot of all the crypto and what the values were,
11 which I provided to the best of my ability, I think,
12 in December.

13 Q. You don't consider that to be
14 accounting-like information?

15 A. What was asked of me later was very
16 different.

17 (Exhibit 75 was marked for identification.)

18 Q. Okay. Let me just hand you Plaintiff's
19 Exhibit 75. I'm going to have you take a look at
20 that for a second.

21 A. Okay.

22 Q. It's an email chain between you and
23 Ms. Thomson and one of her employees where in
24 November of 2021 -- I'm sorry -- December of 2021
25 you have given them a spreadsheet of the

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1 cryptocurrency holdings in response to Ms. Thomson's
2 request for accounting-type information about the
3 crypto, correct?

4 A. Right. And that was -- that was provided.
5 This is as deep as I could go. That was what I had
6 access to.

7 Q. But this is in December of 2021.

8 A. Yes.

9 Q. Yes. So long before April or May
10 Ms. Thomson was asking you for accounting-related
11 information on the crypto, correct?

12 A. It's very different.

13 Q. Very different than what?

14 A. Okay. This is -- this is a list of assets
15 and their values. That's -- that's a very easily
16 quantifiable thing. Later what was being asked was,
17 like, I believed, to the best of my memory, the
18 purchase prices. And that was all over the map
19 because there were so many exchanges at different
20 prices, because the price was fluctuating. So that
21 was what I did not have track of.

22 This was a very easy exercise. Here are
23 the assets. These are the amounts. And it took me
24 awhile, I mean, but I put it together. The other
25 request was incredibly different.

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1 (Exhibit 80 was marked for identification.)

2 Q. All right. I'm going to hand you what's
3 been marked as Plaintiff's Exhibit 80. This is an
4 email exchange amongst yourself and Ms. Thomson and
5 Leih Wang, who you previously testified was an
6 employee of Ms. Thomson's.

7 A. Yes.

8 Q. Where, again, the subject line is "We need
9 to get a handle on the wallets and the staking and
10 understand the portfolios." They're asking you for
11 information and trying to get you on a phone call in
12 January of 2022, correct?

13 A. Yes. And I believe we followed this up
14 with a call with Tushar. We had a Zoom call with
15 Tushar as a follow-up to this.

16 Q. I don't believe that's correct in January
17 2022.

18 Do you have any documents or information to
19 indicate that there was a call with Tushar in
20 January of 2022?

21 A. Absolutely. Yeah, I have tons of
22 documents. We had a Zoom call.

23 Q. Okay.

24 A. That, I am positive of. And you can find
25 references to that in the text message exchanges

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1 with me and Taylor, with me and Leih, and with me
2 and Tushar during that period.

3 Q. Okay. Let's see. And then after -- so
4 what I showed you is December and January, correct,
5 the last two exhibits?

6 A. Yes.

7 Q. And then there's -- generally there was a
8 follow-up from Leih Wang and from Taylor Thomson,
9 asking for information over the following months,
10 correct?

11 A. It was very minimal. The main
12 communication that I recall during that time period,
13 because it was very minimal -- and we can go back
14 and look at the specifics, and you'll see that there
15 is a gap -- I heard from Jacques Brodeur -- I may be
16 pronouncing that incorrectly -- that they needed
17 money to pay -- they needed \$20 million to pay
18 Taylor's taxes. And I was so floored at the fact
19 that anybody would be coming to me for anything
20 monetary and that Taylor didn't have money to pay
21 her taxes. So that email I remember.

22 (Exhibit 78 was marked for identification.)

23 Q. Okay. And then I'm going to hand you
24 what's been marked as Plaintiff's Exhibit 78.

25 This is an email communication between you

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1 and Taylor and Leih Wang, again, where Taylor asks
2 you again for an accounting of all and to walk Leih
3 through the logistics, like the staking and the
4 lockdown of Persistence as well as the unlocking
5 schedule, right?

6 A. Can I -- can I take a look, please?

7 Q. Yeah.

8 A. What's the date?

9 Q. July 29, 2022, right?

10 A. Yeah. And then we did. We go on a -- that
11 was -- we got on the Zoom call with Tushar -- I
12 think we had two separate things scheduled. I think
13 right after this exchange we scheduled something
14 with Tushar, and either Tushar had to cancel or
15 Taylor had to cancel, and we moved it. And I want
16 to say that Zoom happened -- I have to go back and
17 look -- the last week of January approximately, but
18 it was that month.

19 Q. Okay. Let me switch tracks a little bit
20 here. Okay?

21 A. Okay. But that was -- in relation to this,
22 we did. We walked through everything. We brought
23 Leih up to speed. We spent several hours with
24 Tushar to explain it to him, the liquid staking, all
25 of it. So this was addressed directly.

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1 Q. In November -- approximately November of
2 2021, you had a conversation with Ron Murphy --

3 A. Okay.

4 Q. -- about you -- your thought that Taylor
5 Thomson should buy you -- should buy Beau's house
6 for you, correct?

7 A. That was never directly said. That was
8 always my goal, was to get -- buy that house.

9 Q. Okay.

10 A. He knew that. There was never -- it was
11 never said directly that Taylor should buy the
12 house.

13 Q. Was it said indirectly?

14 A. I have no memory of that, but I know from
15 hearing from a reporter that there's an allegation
16 that I was trying to untowardly get Beau's house.
17 That is false.

18 Q. So is it your testimony that you never
19 suggested to Ron Murphy that you thought that Taylor
20 should buy Beau's house for you?

21 A. I do not believe -- I remember having a
22 conversation in November with Ron. And give me a
23 minute, because Ron was a dear friend, so this is a
24 little bit hard to swallow.

25 He was having a hard time with Taylor.

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1 Maybe that was fabricated. And he called me because
2 he was struggling and was expressing his
3 frustrations with Taylor being kind of MIA from his
4 life. And I was expressing my frustrations because
5 I was worried about what I was doing for Taylor and
6 not knowing how it was going to go. I didn't
7 disclose anything to Ron about the structure of what
8 Taylor and I had in place. I didn't disclose it to
9 anybody. But I said I'm working full time and I'm
10 losing other opportunities, I think. I mean, I
11 think that I did express that to him because I was
12 frustrated. I never thought it was going to take
13 over my life the way it did.

14 And because I was not able to do
15 anything -- and I didn't know that I was ever going
16 to receive any compensation. Taylor alluded to
17 that. We had the steps set aside. I had told her
18 that I wanted to utilize some of the money for
19 creating an animal sanctuary. We discussed that at
20 length.

21 Q. Using some of what money?

22 A. Some of the upside from the Persistence.

23 Q. So, again, you are nowhere near answering
24 the question that I asked, which was --

25 (Simultaneous colloquy.)

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1 Q. -- with Ron Murphy that you've said you
2 had --

3 A. Yes.

4 Q. -- you indicated to Ron that you were upset
5 because you'd been doing a lot of work for Taylor
6 Thomson, and you thought you should be compensated
7 in some way, correct?

8 A. He said -- he said, "Do you want to" -- I
9 remember him asking me something to the effect -- I
10 don't know if it was on that call or not, but I've
11 thought about this in hindsight. He said something
12 to the effect of "You guys are simple. You guys
13 live a simple life," because we did. And I said,
14 "Yeah. But I would really love to buy Beau's
15 house." And that -- it was not "Taylor should buy
16 it for me." I always wanted -- I never had any
17 expectation of Taylor buying anything for me, but
18 that was -- a goal line was to get to a place where
19 I could buy that house. It was a very simple, very
20 understated ranch house on a nice property that is
21 now -- no longer exists because of the fires.

22 Q. Let me ask again: Is it your testimony
23 that you did not tell Ron Murphy in that -- in a
24 conversation in November of 2021 in any way that you
25 thought Taylor should buy the house for you?

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1 A. I have no memory of saying that Taylor
2 should buy the house for me, no, but that is a phone
3 conversation that happened four years ago. I don't
4 believe I ever would have said or that I ever said
5 Taylor should buy me anything.

6 Q. Okay. But you did indicate to Ron in that
7 conversation, as you testified a minute ago, that
8 you had been doing a lot of work on Taylor's crypto
9 and that you felt you should be compensated for
10 that?

11 A. I think -- what I remember more about that
12 conversation was the toll it was taking on me. And
13 it's possible that I said something about feeling
14 like I was missing out on other things, but I also
15 remember telling Ron -- because Ron and I both knew
16 that things did not end well for Taylor's employees.
17 And I knew, based on that alone, I did not want to
18 be Taylor's employee. I valued Taylor. I valued
19 Taylor tremendously, especially during that time,
20 because my world had gotten very small during COVID.
21 And Taylor was one of a small handful of people that
22 I saw and that I interacted with. And so --

23 Q. I'm just -- I'm going to ask the question
24 again because I've asked it several times, and you
25 haven't really answered it: So is it your testimony

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1 that in a conversation in or around November of
2 2021, when you told Ron Murphy that you were doing a
3 lot of work for Taylor's crypto -- is it your
4 testimony that you did not say in that conversation
5 that you should be compensated?

6 A. I'm saying I don't remember saying it.

7 Q. Okay.

8 A. I'm telling you what I remember, and I'm
9 saying I don't remember saying that directly. I
10 think that at that point, I did feel like I should
11 be compensated, yes.

12 Q. Okay.

13 A. I was working 80 to 90 hours a week.

14 Q. Okay. You mentioned just a second ago -- a
15 few seconds ago -- and you said this before --
16 because you were handling Taylor Thomson's
17 cryptocurrency, you missed out on other
18 opportunities. What specific opportunities did you
19 miss out on?

20 A. I mean, there was -- there was a lot of
21 things. I'll start with the obvious and then go
22 kind of backwards. When I reached out to
23 Persistence, it was not -- like, it was because I
24 wanted to do, you know, some kind of marketing or
25 some sort of consulting for crypto companies. I

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1 thought, you know, crypto seems like the future. At
2 that moment in time, production had stopped. And so
3 my job was a, you know, film and television
4 producer. Nothing was happening. I needed to
5 pivot.

6 Q. Just so we can agree on when this was, this
7 is, I think, approximately April of 2021 when you
8 first reached out to Mr. Aggarwal at Persistence?

9 A. No. I didn't reach out to Tushar until
10 June, I think.

11 Q. Okay. But -- of 2021?

12 A. It was 2021, yeah.

13 Q. Okay. And as you said, one of the reasons
14 you reached out to Mr. Aggarwal was you -- COVID had
15 affected your industry, you weren't working, and you
16 were looking to create other opportunities for
17 yourself, correct?

18 A. That's correct, yeah.

19 Q. Okay. And -- but Mr. Aggarwal wasn't
20 really interested in having you do marketing for
21 him, right?

22 A. He seemed to be. He -- I had a Zoom with
23 his marketing team. I was going to put together a
24 structure, and we were going to go from there. That
25 was going to be the focus, I thought. But then I

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1 was -- I didn't -- I had a call with Tushar for the
2 first time right before I went with Taylor to
3 Europe. So I think it was -- it was, like, the end
4 of June. And then I went with Taylor to Europe in
5 July, approximately. And when I got back from
6 Europe, I said, "Hey, I'm finally getting back. We
7 can have that marketing call."

8 I can't remember exactly, but I think that
9 I had a follow-up call with the marketing team. We
10 started talking about their brand identity. And
11 then right after that, Taylor came back. And then
12 it moved to me helping Taylor, and then there are --
13 it is documented, if you go through the text
14 messages you have -- I think the ones I sent to
15 you -- I can't remember which person it was. Maybe
16 Abhitej or one of them. I can't remember which one
17 did the marketing -- where I was apologizing that I
18 didn't have time to focus on it because I was
19 consumed with all of the other stuff.

20 And I said, "But hopefully we'll get back
21 to that." So that was -- that was an opportunity.
22 There was another cryptocurrency company that
23 reached out to me at that time about being their
24 head of marketing.

25 Q. Who was that?

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1 A. I am totally blanking on the name. I can
2 look it up for you. It -- I have email chains. It
3 was, I believe, in the Cosmos chain. And I think it
4 was -- I don't know if it was -- I can't remember if
5 it was a token or an exchange, but I think it was an
6 exchange. And I also had the work that I was doing
7 for Michele's company, which I suddenly stopped.
8 And up until that point, I was doing a good chunk of
9 work of bringing in new business and also
10 representing artists. And I couldn't do that
11 anymore. There were also --

12 Q. What time period are you talking about?

13 A. We are talking about -- now we are talking
14 about -- starting in August, 2021, onward, I did not
15 have the resource of time available. And -- and I
16 was happy to do it because I was -- I legitimately
17 thought there would be a longer-term upside from
18 both the experience I was gaining. And, you know, I
19 thought -- I thought, stupidly, Taylor and I were
20 going to build something together and do something
21 with it. You know, she was my friend.

22 Q. Okay. Let me unpack some of that. So it's
23 all -- you are saying that in August of 2021 is when
24 you started getting really busy with Taylor's
25 cryptocurrency, and you had to start turning down

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1 other opportunities. Is that right?

2 A. Yes.

3 Q. Okay. And the one -- you said -- you've
4 talked about, I think, two opportunities. One is
5 with a company whose name you don't remember, right?

6 A. Well, you didn't let me finish, but --

7 Q. I actually did let you make a long-winded
8 answer and finish. So --

9 A. I didn't --

10 Q. And you yourself said you don't remember
11 the name of the company. I'm just repeating what
12 you said.

13 A. It was either -- it was, like -- this was
14 four years ago. It was -- it was -- they reached
15 out to me. I mean, I can go back and look. I
16 don't -- it was -- I can't remember everything.

17 I -- I will be -- how about this. How about I email
18 you by tomorrow with the name just so you have it?

19 Q. Great.

20 A. And we can put it on record.

21 Q. We are going to follow up with a letter
22 asking you to produce a lot of stuff --

23 A. That's fine.

24 Q. -- that hasn't been produced. So -- so
25 that's one opportunity. You were going to be

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1 marketing director for them? Is that what you said?

2 A. Marketing director. And then there was --
3 there were other --

4 Q. Wait, wait. Let's take it one at a time.

5 A. Sure.

6 Q. Did they make you an offer of employment?

7 A. No, but I did not have the ability.

8 Q. And when were you talking to them?

9 A. I think that would have been September.

10 Q. Okay. And did you tell -- if you -- did
11 you tell them that you didn't have time to -- to
12 work with them?

13 A. Yeah.

14 Q. Okay.

15 A. I believe. To the best of my memory.

16 Q. Okay.

17 A. I can't say with certainty, but it was -- I
18 didn't have time.

19 Q. What other -- what other specific
20 opportunities did you turn down?

21 A. Well, I had a slate of projects that I
22 carried over from COVID on the development side.
23 There were several documentaries and scripted
24 features that I abandoned because I didn't have the
25 time for them anymore.

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1 Q. Okay. What were the development projects?

2 A. I mean, there was -- I can send you the
3 slate.

4 Q. Yes. Do you have a list or something --

5 A. Yeah.

6 Q. -- with all the development projects?

7 A. Yeah.

8 Q. Okay. And what -- were you doing that with
9 a company, or what were you doing?

10 A. Well, I was a part of a company that closed
11 at the beginning of COVID. And so those projects
12 were still under my kind of banner to move forward,
13 if I was able. And there was a lot of opportunity
14 there once the production sort of began to resume.
15 To be fair, it -- the industry in general has
16 suffered because of strikes and other things, but
17 that was my -- that was my world. And I had
18 invested a lot of time and energy in development.
19 And, you know, then I left them because I didn't
20 have the time to --

21 Q. Okay. COVID hit in the very beginning of
22 2020, correct?

23 A. Mm-hmm.

24 Q. Okay. And it affected that industry
25 enormously, right?

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1 A. Yes.

2 Q. As you said many times, it basically shut
3 down the industry, and it shut down the company you
4 were working for, correct?

5 A. Yes.

6 Q. The very beginning of 2020?

7 A. Well, not the beginning, but, like, April.

8 Q. Well, March is when everything shut down.

9 A. Yeah.

10 Q. March of 2020, correct? Okay. And you
11 didn't start managing Taylor's crypto for a year and
12 a half after that, correct?

13 A. No. I worked -- I told you I worked with
14 Michele and Cypress Peak.

15 Q. Okay. So what work did you do on these --
16 this slate of development projects between the
17 beginning of 2020 -- whatever it was -- February or
18 March 2020 and the time a year and a half later that
19 you started working on Taylor's crypto?

20 A. The development projects during that time,
21 I didn't do that much work on. But you're always in
22 development. It's constant. You are -- you are
23 researching. You are resourcing. You're -- you
24 know, it's -- the biggest thing that couldn't happen
25 was in-person networking, which I was used to doing

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1 up until that point. So it wasn't as, you know --
2 people kind of just abandoned that sector for a
3 while. I mean, I built a van.

4 Q. That's my -- that's my point. That's my
5 point.

6 A. Yeah.

7 Q. So there wasn't really any development work
8 going on between March of 2020 and mid to late 2021,
9 correct?

10 A. Correct. But it was starting to pick up
11 again right around the time I started helping Taylor
12 is my point.

13 Q. And was there any specific offers or --
14 anything more about these development projects? Did
15 people -- did anyone specific approach you and say,
16 "We should revitalize that project" or "I would like
17 to have a contract with you about developing that
18 thing" or "I would like to invest some money in
19 that"? Anything specific?

20 A. I know that there were a number of
21 projects -- one with an actress and friend of mine
22 Lina Esco that she was developing. I had a book
23 option for my friend Toby Barlow. I mean, there was
24 a few projects that came to me, and I did not
25 have -- I did not have the time. So like anything,